

BREACH RESPONSE PROTOCOL WORK GROUP PROJECT CHARTER

KEY TERMS

Breach response protocol: A breach response protocol defines and sets forth the method used to investigate, notify and mitigate in case of a breach that releases unsecured PHI, specifically in this case the procedures to be used by HIEs and their participants.

WORK GROUP DIRECTIVE

ILHIE Authority Breach Response Protocol to be proposed to the DSPC for recommendation to the ILHIE Authority Board of Directors in an effort to standardize breach response process for all ILHIE Participants.

The Breach Response Protocol Work Group shall consider, provide feedback and recommend amendments to the proposed ILHIE Authority's Breach Response Protocol. The Protocol standardizes breach investigation, notification and mitigation obligations arising from the use of the ILHIE between the ILHIE Authority and all Participants. The finalized Protocol shall be recommended through the ILHIE Authority Data Security and Privacy Committee (DSPC) to the ILHIE Authority Board of Directors. If adopted, the Protocol will be incorporated into Participant data sharing agreements.

DELIVERABLES

- An ILHIE Privacy and Security Policy and Procedure identifying standard ILHIE participant breach response requirements to be incorporated into the ILHIE Authority's Data Sharing Agreement (DSA)

MAJOR ACTIVITIES

- Review and discussion of policy
- Revision as necessary
- Proposal, including draft policy to the DSPC

TIMELINE

- **July/Aug 2013** – Work Group finalization of feedback/amendments
- **Mid-Oct 2013** – Proposal to the Data Security and Privacy Committee of the ILHIE Authority Board
- **Nov 2013** – Recommendation to the ILHIE Authority Board
- **Nov/Dec 2013** – Adoption, publication on website and DSA template modifications

WORKSHOP HANDOUTS

- Draft Privacy and Security Policy and Procedure
- Chart setting forth the basis for key elements of the Privacy and Security Policy and Procedure and comparing the policies and procedures of various entities and states

STAKEHOLDER ROLE

- Solicit feedback and insight from health systems, hospitals, physician practices, regional health information exchanges and patient advocacy groups to provide credibility when applied to all Participants